

1 LICHTEN & LISS-RIORDAN, P.C.  
2 Shannon Liss-Riordan, Bar No. 310719  
3 sliss@llrlaw.com  
4 Thomas Fowler (*pro hac vice* forthcoming)  
5 tfowler@llrlaw.com  
6 729 Boylston Street, Suite 2000  
7 Boston, MA 02116  
8 Tel: +1.617.994.5800  
9 Fax: +1.617.994.5801

10 Attorneys for Plaintiffs  
11 EMMANUEL CORNET, JUSTINE DE  
12 CAIRES, GRAE KINDEL, ALEXIS  
13 CAMACHO, AND JESSICA PAN, on behalf of  
14 themselves and all others similarly situated

15 MORGAN, LEWIS & BOCKIUS LLP  
16 Eric Meckley, Bar No. 168181  
17 eric.meckley@morganlewis.com  
18 Brian D. Berry, Bar No. 229893  
19 brian.berry@morganlewis.com  
20 One Market, Spear Street Tower  
21 San Francisco, CA 94105  
22 Tel: +1.415.442.1000  
23 Fax: +1.415.442.1001

24 Attorneys for Defendant  
25 TWITTER, INC.

26 EMMANUEL CORNET, JUSTINE DE  
27 CAIRES, GRAE KINDEL, ALEXIS  
28 CAMACHO, AND JESSICA PAN, on behalf  
of themselves and all others similarly situated,

Case No. 3:22-cv-06857-JD

**STIPULATION AND [PROPOSED] ORDER  
ON HEARING DATE AND REPLY  
BRIEFING ON PLAINTIFFS'  
EMERGENCY MOTION FOR  
PROTECTIVE ORDER**

Plaintiffs,

v.

TWITTER, INC.

Defendant.

1 WHEREFORE, pursuant to Northern District Civil Local Rule 6-3 Plaintiffs Emmanuel  
2 Cornet, Justine de Caires, Grae Kindel, Alexis Camacho, and Jessica Pan (“Plaintiffs”) and  
3 Defendant Twitter, Inc. (“Twitter”) have met and conferred and submit this Stipulation and  
4 [Proposed] Order regarding the hearing date and reply deadline for Plaintiffs’ Emergency Motion  
5 for a Protective Order.

6 WHEREAS, on November 9, 2022, Plaintiffs filed their Emergency Motion for a  
7 Protective Order (ECF No. 7) (“Motion”);

8 WHEREAS, on November 10, 2022, Plaintiffs filed an Emergency Motion to Shorten  
9 Time for the briefing schedule and hearing on their Motion (ECF No. 11);

10 WHEREAS, on November 14, 2022, the Court issued an order directing Twitter to  
11 respond to the Motion by November 21, 2022 (ECF No. 13).

12 Due to the significant interests and expectations of the employees impacted by the  
13 reduction in force, and Twitter’s desire to minimize the impacted employees’ continued  
14 uncertainty regarding the severance they will be offered, Twitter is agreeable to have Plaintiffs’  
15 Motion resolved on an expedited schedule. As a result, the Parties respectfully request that the  
16 Court set the following schedule: Twitter will file its Opposition on November 21, per the  
17 Court’s order; Plaintiffs will file their reply on November 23; and the Motion will be set for  
18 hearing on Tuesday, November 29, or as otherwise convenient for the Court during the week of  
19 November 28 to December 2. If the Court adopts the Parties’ proposed schedule in material  
20 substance, Twitter will not seek releases until after the Motion is heard and decided.

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22 Dated: November 16, 2022

LICHTEN & LISS-RIORDAN, PC

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By: /s/ Shannon Liss-Riordan  
Shannon Liss-Riordan  
Thomas Fowler  
Attorneys for Plaintiffs  
EMMANUEL CORNET, JUSTINE DE  
CAIRES, GRAE KINDEL, ALEXIS  
CAMACHO, AND JESSICA PAN, on  
behalf of themselves and all others similarly  
situated

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1 Dated: November 16, 2022

2  
3 MORGAN, LEWIS & BOCKIUS LLP

4 By: /s/ Eric Meckley  
5 Eric Meckley  
6 Brian D. Berry  
7 Attorneys for Defendant  
8 TWITTER, INC.

9  
10  
11 **FILER'S ATTESTATION**

12 Pursuant to Local Rule 5-1(h)(3) regarding signatures, I attest that all other signatories  
13 listed, and on whose behalf this filing is submitted, concur in the document's content and have  
14 authorized the filing.

15 DATED: November 16, 2022

16 MORGAN, LEWIS & BOCKIUS LLP

17 By: /s/Eric Meckley  
18 Eric Meckley

19 Attorneys for Defendant  
20 TWITTER, INC.

21  
22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: \_\_\_\_\_

24 The Honorable James Donato

25 United States District Judge